

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	Case No. 1:24-cv-12395
Plaintiff,)	
)	Dist. Judge F. Dennis Saylor, IV
v.)	
)	
SCOTT P. DOIG,)	
BRUCE M. DOIG,)	
TESLA, INC.,)	
SOLARCITY CORPORATION, now known)	
as TESLA ENERGY OPERATIONS, INC.,)	
COMMONWEALTH OF)	
MASSACHUSETTS, and)	
CITY OF BEVERLY,)	
)	
Defendants.)	
_____)	

JOINT MOTION TO STAY CASE

Plaintiff United States of America, Defendant Bruce M. Doig, and Defendant City of Beverly, the only remaining parties actively litigating this case, jointly submit this Motion to stay this case.

The attorney for Bruce Doig and the Trial Attorney for the United States have entered into a settlement agreement that will result in resolution of this case. Additional time will be needed for Defendant Bruce Doig to perform the actions required pursuant to the terms of the settlement.

The parties request that the Court 1) stay the case without closing it, 2) cancel all upcoming deadlines in the current case schedule, and 3) require that, within 90 days, the parties file a status report as to the settlement, if the parties have not already stipulated to dismissal of the case or stipulated to judgment.

UNITED STATES OF AMERICA

/s/ Philip L. Bednar

Philip L. Bednar
Trial Attorney
U.S. Department of Justice, Tax Division
Post Office Box 55
Washington, D.C. 20044
Tel: (202)-307-6415
Fax: (202)-514-5238
Philip.L.Bednar@usdoj.gov
Counsel for Plaintiff United States of
America

GODDARD, SCUTERI & DELANEY

/s/ Thomas J. Delaney (by email permission)

THOMAS J. DELANEY (MA
BBO#550141)
27 Congress Street, Suite 401
Salem, MA 01970
978-745-6200 (v)
978-741-2368 (f)
tdelaney@gsd-law.com
Counsel for Defendant Bruce M. Doig

CITY OF BEVERLY

By its attorney

/s/ Beth A. Oldmixon (by email permission)

BETH A. OLDMIXON (MA BBO#662318)
Solicitors Office
191 Cabot Street
Beverly, MA 01915
978-605-2336 (v)
boldmixon@beverlyma.gov
Counsel for Defendant City of Beverly

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and copies will be sent to those indicated as non-registered participants on May 7, 2025.

Scott P. Doig
11188 102nd Way
Largo, FL 33773
Defendant

Tesla, Inc.
Attn: C T Corporation System, Registered Agent
155 Federal St., Ste. 700
Boston, MA 02110
Defendant

SolarCity Corporation, now known as Tesla Energy Operations, Inc.
Attn: C T Corporation System, Registered Agent
155 Federal St., Ste. 700
Boston, MA 02110
Defendant

/s/ Philip L. Bednar